



May 11, 1983

Mr. Harry Seraydarian, Director
Toxics & Waste Management Division
United States Environmental Protection Agency, Region IX
215 Fremont Street
San Francisco, CA 94105

Re: Docket No. 9-83-RCRA-6
Facility I.D.: AZD088301213

Dear Mr. Seraydarian:

On May 4, 1983, Union Manufacturing Inc., a subsidiary of Model Industries Inc., signed a Consent Agreement which required that certain remedial actions be undertaken and completed by dates specified by the EPA.

Article IV, paragraph three (3) requires that liability requirements coverage for sudden and non-sudden accidental occurrences, as defined in 40 CFR 265.147(a)(b), be demonstrated by the respondent by the close of business, May 18, 1983.

We have requested this coverage from our insurer, Continental Insurance. Due to the nature and speciality, as well as the required wording of the policy, there is some concern that it may not be possible to adhere to the specified date. Please be assured that we are using every means possible to expedite this matter.

We respectfully request at this time that an extension of ten (10) days be granted to allow for proper processing of the required documents. Please convey your decision at your earliest possible opportunity.

Sincerely,

Claude B. Siemien,
Manufacturing Manager

CBS/rw

cc: David M. Jones, Esq.
Office of Regional Counsel,
EPA, Region IX
H.A. Krueger
D.J. Scimeca



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United States Environmental Protection Agency
215 Fremont Street
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Re: Docket No. 9-83-RCRA-6
Facility I.D.: AZD088301213

Dear Mr. Seraydarian:

Pursuant to the Consent and Final Order signed by Union Manufacturing Inc., a subsidiary of Model Industries Inc., the following status report is submitted fulfilling the requirements of Article IV, paragraphs four(4) and five(5):

Paragraph 4. Union Manufacturing hereby certifies that it is in full compliance with the requirements of 40 CFR 265.14(a,b) covering security of an operation deemed by the EPA as an hazardous waste storage facility.

It is the belief of Union Manufacturing that the unknowing unauthorized entry of personnel or livestock onto the active parts of the facility, causing physical contact or disturbance of the waste, will not result in injury as stated in 40 CFR 265.14(a)(1)(2).

Union Manufacturing has, nevertheless, adhered to the parameters as set forth in 40 CFR 265.14(b)(1)(2). The four areas cited in the original Compliance Order are monitored by facility personnel between the hours of 6:00 a.m. and 4:00 p.m. Surveillance of the entire facility between the hours of 4:00 p.m. and 7:00 a.m. is provided by the Pima-Chandler Industrial Park Security Force who control the one and only entrance into the park. The alleged hazardous sites have been fenced in and signs reading "Danger - Hazardous Waste - Keep Out" were posted on May 9, 1983. ✓

Paragraph 5. Union Manufacturing hereby certifies that it is in full compliance with the requirements of 40 CFR 262.21(a)(4) regarding the required information on manifest documents; 40 CFR 265.17(a), governing requirements for temporary storage of ignitable, reactive, or incompatible wastes; 40 CFR 265.71, covering condition of containers; and 40 CFR 265.173, dictating the management of hazardous waste containers.

Manifests contain all required information, i.e., manifest document number, generator information, transporter and EPA identification, facility and EPA identification, waste description, quantity and certification.

All ignitable waste has been transferred to an area where it will not come in contact with various sources of ignition. In addition, "No Smoking" signs have been posted at the storage site as well as adjacent areas. This work was completed on April 27, 1983.

Containers used for hazardous waste are in good condition; all have lids securely fastened and are properly tagged with hazardous waste labels. This work was completed on December 2, 1982.

All containers are closed during storage, and handling is done in such a manner as to prevent damage or rupture.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Sincerely,

A handwritten signature in blue ink, appearing to read 'CBS', with a long horizontal flourish extending to the right.

Claude B. Siemien,
Manufacturing Manager

CBS/rw

cc: D.J. Scimeca
H.A. Krueger
Arizona Health Dept.,
Bruce Scott